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1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY  
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4 ~~For Attorney's Eyes Only~~ EXHIBITS: 1-2  
5

6 IN THE UNITED STATES DISTRICT COURT FOR THE  
7 DISTRICT OF DELAWARE  
8 C.A. NO. 04-1300-SLR

9 ETHYPHARM S.A. FRANCE and )  
10 ETHYPHARM S.A. SPAIN, )  
11 Plaintiffs, )  
12 vs. )  
13 BENTLEY PHARMACEUTICALS, )  
14 INC., )  
15 Defendant. )

16 DEPOSITION OF CONCHA SANCHEZ, taken on  
17 behalf of the Plaintiffs, pursuant to the  
18 Delaware Rules of Civil Procedure before  
19 Tina M. Sarcia, Registered Professional  
20 Reporter and Notary Public within and for the  
21 Commonwealth of Massachusetts, at the law  
22 offices of Edwards, Angell, Palmer & Dodge,  
23 111 Huntington Avenue, Boston, Massachusetts,  
24 on Friday, June 30, 2006, commencing at 9:00  
a.m.



<p style="text-align: right;">Page 2</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 APPEARANCES</p> <p>3 Dwight P. Bostwick, Esquire</p> <p>4 Jonathan D. Fine, Esquire</p> <p>5 BAACH, ROBINSON &amp; LEWIS</p> <p>6 1201 F Street, NW, suite 500</p> <p>7 Washington, DC 20004</p> <p>8 202.659.6744</p> <p>9 dwight.bostwick@baachrobinson.com</p> <p>10 For the Plaintiffs</p> <p>11</p> <p>12 Veronica C. Abreu, Esquire</p> <p>13 EDWARDS, ANGELL, PALMER &amp; DODGE, LLP</p> <p>14 111 Huntington Avenue</p> <p>15 Boston, Massachusetts 02199</p> <p>16 617.239.0577</p> <p>17 jmingolla@eapdlaw.com</p> <p>18 For the Defendant</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 4</p> <p>1 INDEX</p> <p>2 DEPONENT</p> <p>3 CONCHA SANCHEZ PAGE</p> <p>4 Examination by Mr. Fine 6, 82</p> <p>5 Examination by Ms. Abreu 79</p> <p>6</p> <p>7</p> <p>8 EXHIBITS</p> <p>9</p> <p>10 NO. DESCRIPTION PAGE</p> <p>11 1 Calendar 53</p> <p>12 2 Document 57</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
<p style="text-align: right;">Page 3</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 APPEARANCES</p> <p>3 Rafael Garcia-Palencia, Esquire</p> <p>4 Rebeca Corral Gregorio, Esquire</p> <p>5 ALZAGA, G. PALENCIA, G. DE MERCADO &amp;</p> <p>6 ASOCIADOS</p> <p>7 28014 Madrid</p> <p>8 C/. Marques de Cubas, 6, 2 Dcha</p> <p>9 91 360 51 83</p> <p>10 rgarciapalencia@iberforno.net</p> <p>11 For the Defendant</p> <p>12</p> <p>13 THE INTERPRETER: Ivelissa Escalera</p> <p>14 THE VIDEOGRAPHER: Kristin Zarnetske</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 5</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 THE VIDEOGRAPHER: This is tape</p> <p>3 number one of the videotape deposition of</p> <p>4 Concha Sanchez taken by plaintiffs in the</p> <p>5 matter of Ethypharm SA France and Ethypharm</p> <p>6 SA Spain, plaintiffs versus Bentley</p> <p>7 Pharmaceuticals, Inc., defendant in the</p> <p>8 United States District Court for the district</p> <p>9 of Delaware, case number 041300 SOR.</p> <p>10 This deposition is being held on</p> <p>11 June 30, 2006 at approximately 8:58 a.m. My</p> <p>12 name is Kristin Zarnetske. I'm a legal</p> <p>13 videographer representing Esquire Deposition</p> <p>14 Services. The court reporter also in</p> <p>15 association with Esquire is Tina Sarcia.</p> <p>16 This deposition is being held at the</p> <p>17 law firm of Edwards, Angell, Palmer and Dodge</p> <p>18 at 111 Huntington Street, Boston,</p> <p>19 Massachusetts.</p> <p>20 Will counsel present, please,</p> <p>21 introduce themselves for the record.</p> <p>22 MR. FINE: Good morning, Senor</p> <p>23 Sanchez. My name is Jonathan Fine, and this</p> <p>24 is Dwight Bostwick, and we represent the</p>

2 (Pages 2 to 5)

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JT-A-1202

<p style="text-align: right;">Page 6</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 plaintiffs in this proceeding, and the</p> <p>3 plaintiffs are two companies, Ethypharm</p> <p>4 France and Ethypharm Spain.</p> <p>5 MS. ABREU: And if I could just</p> <p>6 introduce myself for the record, Concha, my</p> <p>7 name is Veronica Abreu, and I represent the</p> <p>8 defendant in the action, Bentley</p> <p>9 Pharmaceuticals.</p> <p>10 MR. FINE: And to introduce the</p> <p>11 other people --</p> <p>12 THE VIDEOGRAPHER: I just want to</p> <p>13 have the court reporter swear in the</p> <p>14 interpreter and the witness.</p> <p>15 CONCHA SANCHEZ, a witness called by</p> <p>16 counsel for the PLAINTIFFS, having been</p> <p>17 satisfactorily identified and duly sworn by</p> <p>18 the Notary Public, was examined and testified</p> <p>19 as follows:</p> <p>20 *****</p> <p>21 EXAMINATION BY MR. FINE</p> <p>22 Q. Thank you, Senor Sanchez. And to introduce</p> <p>23 the rest of the people around the room, we</p> <p>24 have an interpreter to help you to translate</p>	<p style="text-align: right;">Page 8</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 other words, if you nod or shake your head,</p> <p>3 the court reporter will not be able to take</p> <p>4 that down.</p> <p>5 Also, this can be very tiring, and</p> <p>6 if it does, feel free to ask to take a break,</p> <p>7 and I will frequently ask to take breaks as</p> <p>8 well; but we probably will not take a break</p> <p>9 between a question and your answer, but we</p> <p>10 can finish up your answer or a question and</p> <p>11 then take a break.</p> <p>12 A. Okay.</p> <p>13 Q. I would also ask you to not discuss your</p> <p>14 testimony with your counsel during a break.</p> <p>15 Do you have any questions?</p> <p>16 A. No.</p> <p>17 Q. Would you, please, state your full name and</p> <p>18 spell it for the record.</p> <p>19 A. Concha Sanchez, C-O-N-C-H-A, first; last name</p> <p>20 S-A-N-C-H-E-Z; second last name Hernandez,</p> <p>21 H-E-R-N-A-N-D-E-Z.</p> <p>22 Q. Thank you. And where do you live?</p> <p>23 A. In Spain.</p> <p>24 Q. In Madrid?</p>
<p style="text-align: right;">Page 7</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 my questions and your answers in order that</p> <p>3 the court reporter can create a record of</p> <p>4 what we say here today.</p> <p>5 We also have a videographer who will</p> <p>6 be recording on video our questions and your</p> <p>7 answers. I believe we also have two</p> <p>8 attorneys from Belmac Laboratorios in Spain</p> <p>9 who are observing this deposition.</p> <p>10 Do you have any questions about who</p> <p>11 anyone is?</p> <p>12 A. No.</p> <p>13 Q. As a general matter, if you have any</p> <p>14 questions, if you don't understand what I ask</p> <p>15 or anything that's going on, please feel free</p> <p>16 to ask through the interpreter, and we'll see</p> <p>17 if we can explain it.</p> <p>18 A. Thank you.</p> <p>19 Q. You're welcome. Have you testified in a</p> <p>20 United States legal proceeding before?</p> <p>21 A. Never.</p> <p>22 Q. There are a couple of things that I should</p> <p>23 say. One is that I will ask a question</p> <p>24 orally, and you should answer orally. In</p>	<p style="text-align: right;">Page 9</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. Madrid.</p> <p>3 Q. Could you give me your address?</p> <p>4 A. Maranosa Street, 28018, Madrid, Spain.</p> <p>5 Q. And what languages do you speak?</p> <p>6 A. Spanish. English a little bit.</p> <p>7 Q. Do you speak French?</p> <p>8 A. No.</p> <p>9 Q. Do you read English at all?</p> <p>10 A. A little, yes.</p> <p>11 Q. How well do you read English?</p> <p>12 A. Like in my job, you know, any letter or</p> <p>13 e-mail that I have I have to read it more or</p> <p>14 less. I copied in English.</p> <p>15 Q. Do you mean you translate something from</p> <p>16 Spanish into English?</p> <p>17 A. Usually, no. I just pass it into the</p> <p>18 computer.</p> <p>19 Q. So if someone gave you something in English,</p> <p>20 you would type it into a computer if that was</p> <p>21 what was called for?</p> <p>22 A. Yes, effectively.</p> <p>23 Q. I think I understand. Are you now employed?</p> <p>24 A. Yes.</p>

3 (Pages 6 to 9)

<p style="text-align: right;">Page 10</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. Where are you employed?</p> <p>3 A. Laboratorios Belmac.</p> <p>4 Q. What is your position?</p> <p>5 A. Secretary of administrations.</p> <p>6 Q. And is that in Madrid?</p> <p>7 A. Yes.</p> <p>8 Q. Do you ever travel to Zaragoza for work?</p> <p>9 A. I have traveled, one time, not too often.</p> <p>10 Q. For your work?</p> <p>11 A. Yes.</p> <p>12 Q. When were you hired as secretary of</p> <p>13 administration?</p> <p>14 THE INTERPRETER: She's using the</p> <p>15 term "seretaria de direccion." I thought</p> <p>16 that was administration; but when I said</p> <p>17 administration in Spanish, she said it's not</p> <p>18 administration. So I'm not sure how the "de</p> <p>19 direccion" is best translated into English.</p> <p>20 Q. What do you understand to be the difference</p> <p>21 between "direccion" and "administration"?</p> <p>22 A. When I say secretary direccion, I mean the</p> <p>23 direct secretary to the general director.</p> <p>24 When I say secretary administrative, I mean</p>	<p style="text-align: right;">Page 12</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 the general director of Laboratorios Belmac?</p> <p>3 A. Yes.</p> <p>4 Q. And have you been secretary for the director</p> <p>5 general of Laboratorios Belmac continuously</p> <p>6 since you were hired in 2000?</p> <p>7 A. Yes, I continue to be.</p> <p>8 Q. Who hired you to be secretary for the general</p> <p>9 director?</p> <p>10 A. I don't understand the question very well.</p> <p>11 Q. Did someone indicate to you that the position</p> <p>12 of secretary general was available?</p> <p>13 A. I was working in reception, and at the time</p> <p>14 the woman that was the secretary of the</p> <p>15 general director, which was Clemente</p> <p>16 Gonzalez, had a baby and left the position</p> <p>17 due to the birth of the child.</p> <p>18 And I began to work some for the</p> <p>19 three directors that were at that time --</p> <p>20 which were Clemente Gonzalez, Fernando</p> <p>21 Berenguer and Adolfo Herrera.</p> <p>22 Q. I'm sorry. I don't quite understand. In</p> <p>23 2000 the secretary who had been working for</p> <p>24 Clemente Gonzalez had a baby and left her</p>
<p style="text-align: right;">Page 11</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 being a secretary of any other department,</p> <p>3 you know, like finance or commerce or</p> <p>4 anything else.</p> <p>5 Q. When were you hired to be the secretary of</p> <p>6 direction?</p> <p>7 A. I began approximately beginning of the year</p> <p>8 2000.</p> <p>9 Q. Did you work for Laboratorios Belmac before</p> <p>10 that?</p> <p>11 A. Yes.</p> <p>12 Q. In what position?</p> <p>13 A. Receptionist.</p> <p>14 Q. When were you first hired at Laboratorios</p> <p>15 Belmac?</p> <p>16 A. It was March 1999.</p> <p>17 Q. And were you a receptionist in Madrid?</p> <p>18 A. Yes, in Madrid.</p> <p>19 Q. For Laboratorios Belmac?</p> <p>20 A. Yes.</p> <p>21 Q. Were you ever a receptionist in Zaragoza?</p> <p>22 A. No.</p> <p>23 Q. So early in 2000, as I understand it, you</p> <p>24 changed positions to become the secretary for</p>	<p style="text-align: right;">Page 13</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 position?</p> <p>3 A. No. It was when I began working on the 1st</p> <p>4 of March in 1999, on the same day I began</p> <p>5 working the secretary that was working for</p> <p>6 Clemente gave birth to a baby and the</p> <p>7 position became vacant.</p> <p>8 Q. Do you recall what the name of that</p> <p>9 secretary's name was?</p> <p>10 A. I don't remember exactly the name. I don't</p> <p>11 remember exactly.</p> <p>12 Q. Was it Laura Peterson?</p> <p>13 A. Laura, yes.</p> <p>14 Q. And from March 1999 you worked as a</p> <p>15 receptionist but also did work for</p> <p>16 Dr. Clemente Gonzalez, Fernando Berenguer and</p> <p>17 Adolfo Herrera?</p> <p>18 A. Yes, effectively that's how it was.</p> <p>19 Q. What previous experience had you had as a</p> <p>20 secretary?</p> <p>21 A. I was working for a corporation that made</p> <p>22 professional videos and for about eight to</p> <p>23 nine years as secretary of the director of</p> <p>24 finance.</p>

4 (Pages 10 to 13)



1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY

2 Q. I would like to talk a little bit about your

3 responsibilities as general direction of

4 Laboratorios Belmac. You've mentioned that

5 you work for Clemente Gonzalez, Fernando

6 Berenguer and Adolfo Herrera?

7 A. Yes.

8 Q. Do you work for them now?

9 A. Only for Adolfo Herrera.

10 Q. Is Mr. Gonzalez still with Laboratorios

11 Belmac?

12 A. No.

13 Q. Is Mr. Berenguer still with Laboratorios

14 Belmac?

15 A. No. He died.

16 Q. Oh, I'm sorry. Do you recall when he passed

17 away?

18 A. Yes.

19 Q. Could you tell me when it was?

20 A. It has been a year and a half.

21 Q. I'm sorry to have gone into that. Would you

22 like to take a break?

23 A. No. That's fine.

24 MR. FINE: I think I'd like to take

1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY

2 a break.

3 THE VIDEOGRAPHER: The time is 9:18

4 a.m. We're going off the record.

5 (Recess)

6 MR. FINE: The time is 9:24 a.m.

7 We're back on the record.

8 Q. Good morning, Senor Sanchez. Thank you for

9 letting me take a break. We were talking

10 before the break a little bit about the

11 people to whom you work as secretary at

12 Laboratorios Belmac.

13 A. Yes.

14 Q. And you had said that you now only work for

15 Adolfo Herrera?

16 A. Yes.

17 Q. Is there anyone else for whom you have worked

18 as a secretary at Laboratorios Belmac?

19 A. No.

20 Q. Is there anyone else for whom you have worked

21 as a secretary while you were at Laboratorios

22 Belmac?

23 A. Excuse me.

24 Q. While you've been employed at Laboratorios

1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY

2 Belmac, have you ever typed a letter or

3 translated -- not translated, typed a letter

4 or done any of the things that you do as a

5 secretary for anyone other than

6 Mr. Berenguer, Dr. Gonzalez and Mr. Herrera?

7 A. Aside from the three of them, no.

8 Q. Have you ever provided or have you ever

9 worked -- let me rephrase that.

10 Have you ever done any work for

11 James Murphy?

12 A. No.

13 Q. Are you familiar with the name James Murphy?

14 A. Yes.

15 Q. Have you ever done any work while you have

16 been a secretary at Laboratorios Belmac for

17 Michael Price?

18 A. No.

19 Q. What are your responsibilities as secretary

20 for Mr. Herrera? I'm going to ask you to

21 stop so the translator can translate.

22 A. Responsibility of direction as normal. I

23 make the traveling arrangements for him which

24 he travels quite often. All the phone calls

1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY

2 that come through the direct line, I answer

3 those phone calls. I file all documents.

4 Anything else that could come up at that

5 level of direction, you know, I pass to him

6 the e-mails, you know, the mail that he

7 receives.

8 I also send e-mails for him that he

9 gives me to write for him, and if I have to

10 arrange a meeting with someone -- and that's

11 enough.

12 Q. Do you do anything else?

13 A. Aside from work?

14 Q. Aside from those things that you mentioned as

15 your responsibilities at work.

16 A. I have some of the responsibilities of the

17 trademarks.

18 Q. What responsibilities are those?

19 A. The correspondence of the trademarks.

20 Q. Anything else?

21 A. No.

22 Q. As I understand it, you respond to or you

23 deal with correspondence?

24 A. Yes. I have Mr. Herrera's mail and then I

5 (Pages 14 to 17)

<p style="text-align: right;">Page 18</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 pass it to him.</p> <p>3 Q. You answer his direct phone line?</p> <p>4 THE INTERPRETER: Correction, when</p> <p>5 she said "centralita," I answered the call</p> <p>6 through "centralita," I thought it was the</p> <p>7 direct line, and I just asked her to clarify</p> <p>8 this for me, and she said "centralita" means</p> <p>9 the general phone extension.</p> <p>10 Q. Do you answer the phones for everyone at</p> <p>11 Belmac?</p> <p>12 A. No.</p> <p>13 Q. For whom?</p> <p>14 A. The person from centralita passes to me</p> <p>15 Mr. Herrera's phone calls.</p> <p>16 Q. Does Mr. Herrera have a direct phone line?</p> <p>17 A. Yes.</p> <p>18 Q. Can you answer his direct line?</p> <p>19 A. If he's not present, yes.</p> <p>20 Q. Can you see if his direct line is busy?</p> <p>21 A. No.</p> <p>22 Q. Do you take phone messages from Mr. Herrera?</p> <p>23 A. Yes.</p> <p>24 Q. Do you record those phone messages anywhere?</p>	<p style="text-align: right;">Page 20</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 not be something that you worry about. Do</p> <p>3 you understand?</p> <p>4 A. Yes.</p> <p>5 Q. So we were talking about phone calls that you</p> <p>6 answered for Mr. Herrera. What kind of phone</p> <p>7 does Mr. Herrera have in his office, if you</p> <p>8 know?</p> <p>9 A. What type of phone? Normal phone.</p> <p>10 Q. Is it an Erickson or a Nortel phone?</p> <p>11 A. I don't remember the brand.</p> <p>12 Q. Does it have multiple lines that come into</p> <p>13 it?</p> <p>14 A. At his extension, two phone lines entered</p> <p>15 into his extension.</p> <p>16 Q. Does he have a small screen on top which</p> <p>17 tells what telephone call or what number is</p> <p>18 calling?</p> <p>19 A. Yes.</p> <p>20 Q. And are there buttons to indicate speed</p> <p>21 dialing or direct phone calls?</p> <p>22 A. The buttons do exist, but they're not</p> <p>23 programmed because we don't know how to use</p> <p>24 them.</p>
<p style="text-align: right;">Page 19</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. Yes, notes.</p> <p>3 Q. And do you keep those notes?</p> <p>4 A. No, I just pass them to him.</p> <p>5 Q. Do you keep a record of those notes?</p> <p>6 A. No.</p> <p>7 Q. Do you know if Mr. Herrera keeps a record of</p> <p>8 those notes or those calls?</p> <p>9 A. No. He just calls and then he throws them</p> <p>10 away.</p> <p>11 Q. He does not keep a record of those calls?</p> <p>12 MS. ABREU: Objection. Asked and</p> <p>13 answered.</p> <p>14 A. No.</p> <p>15 Q. As an administrative matter -- and this is</p> <p>16 not a question. As an administrative matter,</p> <p>17 sometimes counsel for Bentley will have a</p> <p>18 question or an objection to a question that I</p> <p>19 ask, and I would ask you to answer the</p> <p>20 question that I've posed as best you can</p> <p>21 unless your attorney asks you not to.</p> <p>22 If there's a question about the</p> <p>23 objection your attorney has, we will talk it</p> <p>24 out as an administrative matter, but it need</p>	<p style="text-align: right;">Page 21</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. And I don't know either. You also mention</p> <p>3 you do filing of documents?</p> <p>4 A. Yes.</p> <p>5 Q. And you handle Mr. Herrera's e-mails?</p> <p>6 A. I send e-mails for him. If I have to send an</p> <p>7 e-mail for him, he gives me in writing what</p> <p>8 it is to be, and I just type it in and send</p> <p>9 it.</p> <p>10 Q. Do you send all of his e-mails?</p> <p>11 A. Not all of them.</p> <p>12 Q. Does he send some of them himself?</p> <p>13 A. Yes.</p> <p>14 Q. Does anyone else send e-mails for</p> <p>15 Mr. Herrera?</p> <p>16 A. No.</p> <p>17 Q. Does Mr. Herrera have a computer in his</p> <p>18 office?</p> <p>19 A. Yes.</p> <p>20 Q. Does he type his own letters?</p> <p>21 A. Sometimes.</p> <p>22 Q. Does he type his own e-mails?</p> <p>23 MS. ABREU: Objection. Asked and</p> <p>24 answered.</p>

6 (Pages 18 to 21)

<p style="text-align: right;">Page 22</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. If it's something short, yes.</p> <p>3 Q. And does he do that on his computer in his</p> <p>4 office?</p> <p>5 A. Yes.</p> <p>6 Q. Does he have any other computers?</p> <p>7 A. No.</p> <p>8 Q. Does Mr. Herrera have an office in the</p> <p>9 Zaragoza plant?</p> <p>10 THE INTERPRETER: She asked office</p> <p>11 or dispatcho (phonetic)?</p> <p>12 Q. An office.</p> <p>13 A. There are offices there, but he doesn't have</p> <p>14 a dispatcho.</p> <p>15 Q. What is a dispatcho?</p> <p>16 A. Dispatcho means a room just as this, one that</p> <p>17 could be smaller but a room just as this one.</p> <p>18 Q. Does he have a room in the plant at Zaragoza</p> <p>19 that he uses for work?</p> <p>20 A. No.</p> <p>21 Q. Is there anyone in the Zaragoza plant who</p> <p>22 writes letters or e-mails for Mr. Herrera if</p> <p>23 he's there?</p> <p>24 A. No.</p>	<p style="text-align: right;">Page 24</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. And do you call him on his mobile phone?</p> <p>3 A. To the mobile or through centralita.</p> <p>4 Q. And you said you also arranged Mr. Herrera's</p> <p>5 travel?</p> <p>6 A. Yes.</p> <p>7 Q. How do you arrange his travel?</p> <p>8 A. With the traveling agency.</p> <p>9 Q. Does Mr. Herrera give you a piece of paper or</p> <p>10 tell you how he would like to travel?</p> <p>11 A. He tells me, you know, how he will like to</p> <p>12 travel and when he's leaving.</p> <p>13 Q. Does Mr. Herrera travel frequently?</p> <p>14 A. Yes.</p> <p>15 Q. To where does he travel?</p> <p>16 A. As I said before, Zaragoza, weekly; Boston,</p> <p>17 here Boston, and if any trips to England or</p> <p>18 Ireland comes up.</p> <p>19 Q. How frequently does Mr. Herrera travel to</p> <p>20 England?</p> <p>21 A. He could go three, four times a year.</p> <p>22 Q. And to Ireland?</p> <p>23 A. He will use the same trip. He will take</p> <p>24 advantage of the same trip.</p>
<p style="text-align: right;">Page 23</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. How frequently did Mr. Herrera go to the</p> <p>3 Zaragoza plant?</p> <p>4 A. Once a week.</p> <p>5 Q. While he's there, he receives no phone calls?</p> <p>6 A. Yes, they do call him at Zaragoza or to his</p> <p>7 mobile phone.</p> <p>8 Q. And who answers the calls if it's not to his</p> <p>9 mobile phone?</p> <p>10 A. The phone calls that are received at Madrid I</p> <p>11 answer them.</p> <p>12 Q. And Zaragoza?</p> <p>13 A. He does.</p> <p>14 Q. So does he have a phone in Zaragoza?</p> <p>15 A. No. They pass the phone call to whichever</p> <p>16 department he is at at that moment.</p> <p>17 Q. And e-mails in Zaragoza?</p> <p>18 A. Of him, no.</p> <p>19 Q. Does he receive e-mails in Zaragoza on a</p> <p>20 Blackberry?</p> <p>21 A. He doesn't know how to use it.</p> <p>22 Q. If Mr. Herrera receives an e-mail while he's</p> <p>23 in Zaragoza, how does he find out about it?</p> <p>24 A. I call him.</p>	<p style="text-align: right;">Page 25</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. And to Boston?</p> <p>3 A. Twice a year more or less.</p> <p>4 Q. Do you know why Mr. Herrera travels to</p> <p>5 Boston?</p> <p>6 A. He comes to the house Madrid --</p> <p>7 MS. ABREU: Objection. Translation.</p> <p>8 MR. FINE: Just for clarification, I</p> <p>9 thought I understood the witness to say casa</p> <p>10 matiz.</p> <p>11 THE INTERPRETER: I'm sorry.</p> <p>12 A. Casa matiz.</p> <p>13 Q. What is casa matiz?</p> <p>14 A. Casa Matiz, I mean Bentley Pharmaceuticals</p> <p>15 which are here in Boston.</p> <p>16 MS. ABREU: Objection. Translation.</p> <p>17 Bentley reserves the right to translate casa</p> <p>18 matiz.</p> <p>19 MR. FINE: I think the witness has</p> <p>20 said what she meant by casa matiz.</p> <p>21 Q. If you think back to 2000, did you make</p> <p>22 travel arrangements for Mr. Herrera in 2000?</p> <p>23 A. I could have done them, but I don't remember.</p> <p>24 Q. Do you remember any trips that Mr. Herrera</p>

7 (Pages 22 to 25)



<p style="text-align: right;">Page 26</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 made in 2000?</p> <p>3 A. I wouldn't be able to remember. I don't</p> <p>4 remember.</p> <p>5 Q. Do you remember any trips that Mr. Herrera</p> <p>6 made in 2001?</p> <p>7 A. I remember trips, but I don't know which</p> <p>8 ones.</p> <p>9 Q. Approximately how many trips did Mr. Herrera</p> <p>10 make in 2001?</p> <p>11 A. We're talking aside from Spain?</p> <p>12 Q. We can talk outside of Spain, and then we'll</p> <p>13 talk about inside of Spain.</p> <p>14 A. Within Spain, as I said, before, he travels</p> <p>15 to Zaragoza on a weekly basis, so he could</p> <p>16 have gone to Zaragoza like about 30 times or</p> <p>17 so.</p> <p>18 Q. And outside of Spain?</p> <p>19 A. Well, usually it could be anything between</p> <p>20 four, five trips, more or less.</p> <p>21 Q. Do you recall to where those trips were?</p> <p>22 A. No, I cannot remember.</p> <p>23 Q. Were any of those trips to Boston?</p> <p>24 A. I imagine that it was because usually he</p>	<p style="text-align: right;">Page 28</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. No, because at the end of the year I give it</p> <p>3 to him, and I give him a new one, and I</p> <p>4 suppose that he threw it away because it has</p> <p>5 no value.</p> <p>6 Q. So do you know if Mr. Herrera still has a</p> <p>7 calendar for 2001?</p> <p>8 A. I don't think so.</p> <p>9 Q. 2001?</p> <p>10 A. No, I don't think so. He usually doesn't</p> <p>11 save them.</p> <p>12 Q. In 2002?</p> <p>13 A. Neither.</p> <p>14 Q. And I'd like to ask you a little bit more on</p> <p>15 your work on a computer.</p> <p>16 A. Okay.</p> <p>17 Q. What e-mail system do you use?</p> <p>18 A. Microsoft.</p> <p>19 Q. And is there a calendar function in the</p> <p>20 Microsoft e-mail system?</p> <p>21 A. Yes.</p> <p>22 Q. Do you ever make any entries for Mr. Herrera</p> <p>23 in that e-mail system for that calendar?</p> <p>24 A. Mr. Herrera's computer, no. At my computer.</p>
<p style="text-align: right;">Page 27</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 comes to Boston, you know, at least once,</p> <p>3 once or twice a year.</p> <p>4 Q. How long does he stay in Boston?</p> <p>5 A. Three, four days, not more than that.</p> <p>6 Q. You have no reason to think he didn't come to</p> <p>7 Boston in 2001?</p> <p>8 MS. ABREU: Objection. Asked and</p> <p>9 answered.</p> <p>10 A. No. I think that he did come.</p> <p>11 Q. Why do you think that he did come?</p> <p>12 MS. ABREU: Objection. Calls for</p> <p>13 speculation.</p> <p>14 A. Because it's the usual thing that he does.</p> <p>15 Q. Does Mr. Herrera keep a calendar?</p> <p>16 A. Of previous years?</p> <p>17 Q. In general, does he keep a calendar for the</p> <p>18 year that isn't?</p> <p>19 A. Of the actual year, yes.</p> <p>20 Q. And do you know if he kept a calendar in</p> <p>21 2000?</p> <p>22 A. I suppose that he did.</p> <p>23 Q. Have you seen any of his calendars for the</p> <p>24 year of 2000?</p>	<p style="text-align: right;">Page 29</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. That's a good point. I would like to back up</p> <p>3 for a second. Do you keep a calendar?</p> <p>4 A. Of the actual current year, you know, as</p> <p>5 usual. Every year it erases itself.</p> <p>6 Q. Sorry. I don't understand. Is it a piece of</p> <p>7 paper that you use, or is it on your</p> <p>8 computer?</p> <p>9 A. In the computer.</p> <p>10 Q. Do you keep track of Mr. Herrera's travel on</p> <p>11 that calendar?</p> <p>12 A. Normally, you know, I enter trips, meetings</p> <p>13 and nothing else.</p> <p>14 Q. Do you enter any important dates for</p> <p>15 Laboratorios Belmac?</p> <p>16 A. I enter information, but it's more for myself</p> <p>17 so I know where Mr. Herrera is going to be.</p> <p>18 Q. And do you keep track of things like at the</p> <p>19 end of a quarter?</p> <p>20 A. Currently, yes.</p> <p>21 Q. Or any important reports that must be filed</p> <p>22 or completed?</p> <p>23 A. I don't understand the question.</p> <p>24 Q. That's okay. We'll come back to it. I'm not</p>

8 (Pages 26 to 29)

<p style="text-align: right;">Page 30</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 asking it in the best way. I would like to</p> <p>3 ask you a little bit about your filing.</p> <p>4 A. Good.</p> <p>5 Q. Tell me a little bit about how you file.</p> <p>6 A. Mr. Herrera receives documents from the</p> <p>7 entire company, and he puts them aside in a</p> <p>8 dedicated place. So I take advantage of the</p> <p>9 day that he's not at the office, the day he's</p> <p>10 at Zaragoza, and I dedicate that day to file.</p> <p>11 And the way I file is the usual way.</p> <p>12 You know, I have a folder for each client by</p> <p>13 date, you know, the usual way that you file,</p> <p>14 utilizing a folder for each client.</p> <p>15 Q. Documents internal to the company?</p> <p>16 A. I have another folder.</p> <p>17 Q. Could you describe that folder?</p> <p>18 A. Well, there are a few depending on the</p> <p>19 department.</p> <p>20 Q. Could you tell me about how many there are?</p> <p>21 A. It could be three or four, no more.</p> <p>22 Q. When did you develop this system?</p> <p>23 A. From the year 2000.</p> <p>24 Q. Is there a file for documents from Bentley</p>	<p style="text-align: right;">Page 32</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. How does Mr. Herrera communicate that to you?</p> <p>3 A. He sends me an e-mail, and he says print this</p> <p>4 one.</p> <p>5 Q. How long have you been filing e-mails from</p> <p>6 Bentley Pharmaceuticals?</p> <p>7 A. Since the year 2000.</p> <p>8 Q. And do you recall any of the subjects of</p> <p>9 those e-mails?</p> <p>10 A. If it's something recent, yes but other, no.</p> <p>11 Q. What are they?</p> <p>12 A. The most recent ones?</p> <p>13 Q. We can start there.</p> <p>14 MS. ABREU: Objection. Phase one.</p> <p>15 Q. I'm sorry. Would you, please, answer the</p> <p>16 question?</p> <p>17 A. Phone calls that Mr. Herrera receives, but</p> <p>18 that's what I can remember. I cannot</p> <p>19 remember the content of it.</p> <p>20 Q. What other sorts of work do you do on your</p> <p>21 computer, other than e-mails?</p> <p>22 A. I have folders of the most important clients</p> <p>23 which I keep information or documentation.</p> <p>24 Q. And those are electronic?</p>
<p style="text-align: right;">Page 31</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Pharmaceuticals?</p> <p>3 A. Yes.</p> <p>4 Q. And how are those filed?</p> <p>5 A. The same, in folders, by dates.</p> <p>6 Q. Is there a single file for all documents from</p> <p>7 Bentley Pharmaceuticals?</p> <p>8 A. Yes.</p> <p>9 Q. And there are no subdivisions within that</p> <p>10 file?</p> <p>11 A. No.</p> <p>12 Q. And approximately in a given week how many</p> <p>13 documents or how many letters does</p> <p>14 Mr. Herrera receive from Bentley</p> <p>15 Pharmaceuticals?</p> <p>16 A. Letters, none. E-mails.</p> <p>17 Q. Do you file Mr. Herrera's e-mails?</p> <p>18 A. Yes.</p> <p>19 Q. Do you print them out to file them?</p> <p>20 A. Some of them I do. Others I don't.</p> <p>21 Q. How do you decide which documents to print</p> <p>22 out to file?</p> <p>23 A. I don't decide on it. Mr. Herrera decides on</p> <p>24 it.</p>	<p style="text-align: right;">Page 33</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. What do you mean?</p> <p>3 Q. On your computer?</p> <p>4 A. Yes, inside the computer I have the folders.</p> <p>5 Q. So you tell me if I understand this. There</p> <p>6 are electronic files in your computer?</p> <p>7 A. Yes.</p> <p>8 Q. That are organized and filed by client?</p> <p>9 A. Yes.</p> <p>10 Q. And also paper documents?</p> <p>11 A. Yes.</p> <p>12 Q. That are organized by client?</p> <p>13 A. Yes.</p> <p>14 Q. Is there a paper file for Ethypharm?</p> <p>15 A. Yes.</p> <p>16 Q. Approximately how big is that paper file?</p> <p>17 A. Very big. I don't know how big but very big.</p> <p>18 Q. It is a meter?</p> <p>19 A. There's a lot of folders, but I don't know.</p> <p>20 Q. Two meters?</p> <p>21 A. Maybe.</p> <p>22 Q. Three meters?</p> <p>23 A. I don't know.</p> <p>24 Q. And electronically, do you have a sense of</p>

9 (Pages 30 to 33)

<p style="text-align: right;">Page 34</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 how large -- is there an electronic file for</p> <p>3 Ethypharm?</p> <p>4 A. Yes, an old one.</p> <p>5 Q. And do you have a sense of how large, how</p> <p>6 many giga that electronic file is?</p> <p>7 A. It's not too big.</p> <p>8 Q. And the file for Bentley, the paper file for</p> <p>9 Bentley, do you have a sense how big that is?</p> <p>10 MS. ABREU: Objection. Asked and</p> <p>11 answered.</p> <p>12 A. It's large. It's continuous.</p> <p>13 Q. Is it one meter?</p> <p>14 A. Meter and a half because it's the size of the</p> <p>15 cabinet.</p> <p>16 Q. How many cabinets does it fill?</p> <p>17 A. Five.</p> <p>18 Q. Five cabinets?</p> <p>19 A. Yes. But they're different sizes. Not all</p> <p>20 of them are a meter and a half.</p> <p>21 Q. Where are those files kept?</p> <p>22 A. In the disptacho of Senor Herrera, my</p> <p>23 disptacho and another disptacho.</p> <p>24 Q. When you say disptacho, do you mean work</p>	<p style="text-align: right;">Page 36</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 clients?</p> <p>3 A. Yes.</p> <p>4 Q. And faxes from Zaragoza?</p> <p>5 A. Yes.</p> <p>6 Q. And faxes from Bentley Pharmaceuticals?</p> <p>7 A. Yes.</p> <p>8 Q. In 2000, approximately how many faxes on a</p> <p>9 given day would Mr. Herrera receive?</p> <p>10 A. I don't remember, but there were just a few.</p> <p>11 Q. When Mr. Herrera received faxes in 2000, do</p> <p>12 you recall who any of them were from?</p> <p>13 A. No, I wouldn't be able to remember.</p> <p>14 Q. Do you recall if any of the faxes were from</p> <p>15 Jim Murphy?</p> <p>16 MS. ABREU: Objection. Asked and</p> <p>17 answered.</p> <p>18 A. I don't remember. I imagine so.</p> <p>19 Q. Were there any faxes from Paul Fitzgibbons?</p> <p>20 A. I don't remember.</p> <p>21 Q. Mr. Mike McGovern?</p> <p>22 A. I don't remember.</p> <p>23 Q. Do you remember any faxes from Michael Price?</p> <p>24 A. I imagine that he did send, but I don't</p>
<p style="text-align: right;">Page 35</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 space?</p> <p>3 A. The room that I work at there are cabinets</p> <p>4 there. The room that Mr. Herrera works at</p> <p>5 there are cabinets there. Then there's</p> <p>6 another room that there are cabinets there</p> <p>7 also.</p> <p>8 Q. And are there any other places at</p> <p>9 Laboratorios Belmac in Madrid where there are</p> <p>10 documents from Bentley?</p> <p>11 A. I imagine so in other departments. I just</p> <p>12 have my own.</p> <p>13 Q. And in other departments, are there also</p> <p>14 archives or files of documents from</p> <p>15 Ethypharm?</p> <p>16 A. I imagine so, but I don't know for sure.</p> <p>17 Q. In a typical day, how many e-mails does</p> <p>18 Mr. Herrera get?</p> <p>19 A. It could be 20, 30, 40.</p> <p>20 Q. In 2001, was it about the same?</p> <p>21 A. No. There were less.</p> <p>22 Q. In 2000, was it about the same?</p> <p>23 A. No. In the year 2000 the fax was utilized.</p> <p>24 Q. When you say fax, was that faxes from</p>	<p style="text-align: right;">Page 37</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 remember which faxes.</p> <p>3 Q. Do you recall any faxes from Jim Hand?</p> <p>4 A. That person is more recently. I think it</p> <p>5 were more e-mails, not faxes.</p> <p>6 Q. So Mr. Hand began communicating with</p> <p>7 Mr. Herrera after 2000?</p> <p>8 A. I'm not sure, but I imagine so because I</p> <p>9 personally got to know about him recently.</p> <p>10 Q. On the e-mails that Mr. Herrera received in</p> <p>11 2001, 2002 and 2003, generally, were they</p> <p>12 sent CCed to you?</p> <p>13 A. Usually they cc for myself but not all of</p> <p>14 them.</p> <p>15 Q. Were there any -- do you know of any e-mails</p> <p>16 that were not cced to you that Mr. Herrera</p> <p>17 received?</p> <p>18 MS. ABREU: Objection. Time frame.</p> <p>19 A. Yes, sometimes.</p> <p>20 Q. In 2001, do you recall any such e-mails?</p> <p>21 A. No.</p> <p>22 MR. FINE: Why don't we take a break</p> <p>23 for a couple of minutes.</p> <p>24 THE VIDEOGRAPHER: The time is 10:07</p>

10 (Pages 34 to 37)



<p style="text-align: right;">Page 38</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 a.m. We're going off the record.</p> <p>3 (Recess)</p> <p>4 THE VIDEOGRAPHER: The time is 10:28</p> <p>5 a.m., and we're back on the record.</p> <p>6 Q. Good morning, Senor Sanchez. Thank you for</p> <p>7 again for allowing me to take a quick break.</p> <p>8 I think a little bit before the break we were</p> <p>9 discussing whether Mr. Herrera receives faxes</p> <p>10 or e-mails from different people?</p> <p>11 A. Yes.</p> <p>12 Q. I would like to ask you about a few of those</p> <p>13 people and see what you recall about them.</p> <p>14 Are you familiar with Michael Price?</p> <p>15 A. Yes.</p> <p>16 Q. And who is Michael Price?</p> <p>17 A. Is the finance director at Bentley</p> <p>18 Pharmaceuticals.</p> <p>19 Q. Does Mr. Price have a secretary?</p> <p>20 A. I don't know.</p> <p>21 Q. Have you ever had any communications with a</p> <p>22 secretary of Mr. Price?</p> <p>23 A. No, because I don't even know if he has a</p> <p>24 secretary.</p>	<p style="text-align: right;">Page 40</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 MS. ABREU: Objection. Ambiguous.</p> <p>3 Time frame.</p> <p>4 Q. While you have been a secretary for</p> <p>5 Mr. Herrera?</p> <p>6 MS. ABREU: Objection. Phase one</p> <p>7 time frame.</p> <p>8 A. Not too many.</p> <p>9 Q. Is it one or two?</p> <p>10 A. Maybe like once a year.</p> <p>11 Q. And were you introduced to Mr. Price?</p> <p>12 A. Yes.</p> <p>13 Q. Who introduced you?</p> <p>14 A. I don't remember.</p> <p>15 Q. What does Mr. Price look like?</p> <p>16 A. He's tall. He's blond. He has blue eyes.</p> <p>17 He's very friendly.</p> <p>18 Q. He's very friendly?</p> <p>19 A. Yes.</p> <p>20 Q. Approximately how old is Mr. Price?</p> <p>21 A. He could be 40, 45, but I'm not sure. He</p> <p>22 could be younger.</p> <p>23 Q. Are you familiar with -- strike that.</p> <p>24 When Mr. Price visited, did you ever</p>
<p style="text-align: right;">Page 39</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. How do you know Mr. Price?</p> <p>3 A. The first time I remember -- the first memory</p> <p>4 that I have is the first time that he went to</p> <p>5 the offices in Laboratorios Belmac in Spain.</p> <p>6 Q. In Madrid or in Zaragoza?</p> <p>7 A. Madrid.</p> <p>8 Q. And when was that approximately?</p> <p>9 A. I don't know, but maybe five, six years. I</p> <p>10 don't remember exactly.</p> <p>11 Q. And do you recall what Mr. Price did when he</p> <p>12 came to Bentley -- sorry, when he came to</p> <p>13 Laboratorios Belmac?</p> <p>14 A. I don't remember.</p> <p>15 Q. Did he meet with anyone?</p> <p>16 A. I suppose that he met with the financial</p> <p>17 director in Spain.</p> <p>18 Q. And who was the financial director in Spain?</p> <p>19 A. Today currently?</p> <p>20 Q. No, at the time when you first recall</p> <p>21 Mr. Price visiting.</p> <p>22 A. Well, it was either Mr. Estevez or Sanchez.</p> <p>23 Q. Do you recall how many times Mr. Price came</p> <p>24 to visit Laboratorios Belmac in Madrid?</p>	<p style="text-align: right;">Page 41</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 have any conversations with him?</p> <p>3 A. No, not usually.</p> <p>4 Q. Not usually or not ever?</p> <p>5 A. Well, you know, I say hi to him. I offer him</p> <p>6 coffee but that's it.</p> <p>7 Q. Do you know Mr. Stote?</p> <p>8 THE INTERPRETER: She uses the word</p> <p>9 -- I wanted to clarify what she said. She</p> <p>10 meant she have heard of him, but she doesn't</p> <p>11 know him.</p> <p>12 Q. How have you heard of Mr. Stote?</p> <p>13 A. I have heard of him through the e-mails that</p> <p>14 Mr. Herrera sends or of the departments like</p> <p>15 the medical department.</p> <p>16 Q. I'm not sure I understand. Mr. Herrera sends</p> <p>17 e-mail to Mr. Stote?</p> <p>18 A. No. He receives copies of e-mails that</p> <p>19 Mr. Herrera is cced, and the original comes</p> <p>20 from Mr. Stote.</p> <p>21 Q. And to whom does Mr. Stote send those</p> <p>22 e-mails?</p> <p>23 A. Usually the person at the medical department,</p> <p>24 the physician.</p>

11 (Pages 38 to 41)

<p style="text-align: right;">Page 42</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. And did Mr. Stote send e-mails to the medical</p> <p>3 department in 2000?</p> <p>4 A. I don't know.</p> <p>5 Q. 2001?</p> <p>6 A. I don't know.</p> <p>7 Q. And who is Mr. Stote?</p> <p>8 A. I think he's a physician, but I don't know</p> <p>9 more of him.</p> <p>10 Q. Does he work in Spain?</p> <p>11 A. No.</p> <p>12 Q. Where does he work?</p> <p>13 A. He works at Bentley Pharmaceuticals.</p> <p>14 Q. I'd like to ask you a little bit about</p> <p>15 Mr. Hand. You learned that Mr. Hand joined</p> <p>16 Bentley Pharmaceuticals recently?</p> <p>17 A. I realized that he was presently just by the</p> <p>18 e-mails that I received through Mr. Herrera.</p> <p>19 Q. And what were those e-mails about?</p> <p>20 A. Usually I don't read them, but my</p> <p>21 understanding is something commercial.</p> <p>22 Q. And what does Mr. Hand do?</p> <p>23 A. I don't know.</p> <p>24 Q. Has Mr. Hand ever come to Spain while you've</p>	<p style="text-align: right;">Page 44</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 MS. ABREU: Objection. Ambiguous.</p> <p>3 A. That I have heard it.</p> <p>4 MR. FINE: I'm sorry, Counsel. I</p> <p>5 haven't heard your objection.</p> <p>6 MS. ABREU: I said objection.</p> <p>7 Ambiguous.</p> <p>8 MR. FINE: Ambiguous. Okay.</p> <p>9 Q. Why do you think you recognize Mr. McGovern's</p> <p>10 name?</p> <p>11 A. Because it sounds familiar that I have heard</p> <p>12 the name before.</p> <p>13 Q. From whom have you heard the name?</p> <p>14 MS. ABREU: Objection. Calls for</p> <p>15 speculation.</p> <p>16 A. I don't know. Just in general. I haven't</p> <p>17 put attention to this gentleman.</p> <p>18 Q. Have you ever seen Mr. McGovern?</p> <p>19 A. If he has been to the office, I don't</p> <p>20 remember. I don't remember his face.</p> <p>21 Q. Do you know Paul Fitzgibbons?</p> <p>22 A. Personally, no. But I have heard his name.</p> <p>23 Q. How did you hear his name?</p> <p>24 A. The same, you know, through e-mails or</p>
<p style="text-align: right;">Page 43</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 been employed at Laboratorios Belmac, if you</p> <p>3 know?</p> <p>4 MS. ABREU: Objection. Phase on</p> <p>5 time frame.</p> <p>6 A. I don't think so.</p> <p>7 Q. Does Mr. Hand have a secretary?</p> <p>8 A. I don't know.</p> <p>9 Q. Has anyone identifying him or herself as a</p> <p>10 secretary for Mr. Hand communicated with you?</p> <p>11 MS. ABREU: Objection. Time frame.</p> <p>12 A. No.</p> <p>13 Q. Does Mr. Stote have a secretary?</p> <p>14 A. I don't know.</p> <p>15 Q. Has anyone identifying him or herself as a</p> <p>16 secretary --</p> <p>17 A. No.</p> <p>18 Q. -- communicated with you?</p> <p>19 A. No.</p> <p>20 Q. Cleveland Russel, do you know that name?</p> <p>21 A. No.</p> <p>22 Q. Michael McGovern, who is Michael McGovern?</p> <p>23 A. I don't know who he is.</p> <p>24 Q. In what context have you recognized his name?</p>	<p style="text-align: right;">Page 45</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 documents.</p> <p>3 Q. Do you know who he is?</p> <p>4 A. No.</p> <p>5 Q. Has he sent e-mails to Mr. Herrera?</p> <p>6 A. He could have send one or so, but I don't</p> <p>7 remember exactly.</p> <p>8 Q. Do you remember what the topic of that e-mail</p> <p>9 was?</p> <p>10 A. No. I couldn't be able to remember.</p> <p>11 Q. William Packer?</p> <p>12 A. I have never heard of him.</p> <p>13 Q. Have you ever heard of Jordan Horvath?</p> <p>14 A. Yes, I have heard of him.</p> <p>15 Q. Who is Jordan Horvath?</p> <p>16 A. I think he used to work for Bentley</p> <p>17 Pharmaceuticals.</p> <p>18 Q. You said he used to work for Bentley</p> <p>19 Pharmaceuticals?</p> <p>20 A. Yes.</p> <p>21 Q. Do you know if he still works for Bentley</p> <p>22 Pharmaceuticals?</p> <p>23 A. I don't think he does anymore.</p> <p>24 Q. Why do you think he does not?</p>

12 (Pages 42 to 45)

<p style="text-align: right;">Page 46</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. Because I haven't heard of his name again.</p> <p>3 Q. Do you know who he is?</p> <p>4 A. I think he was an attorney.</p> <p>5 Q. Did Mr. Horvath ever communicate with</p> <p>6 Mr. Herrera?</p> <p>7 MS. ABREU: Objection. Phase one</p> <p>8 time frame.</p> <p>9 A. Yes.</p> <p>10 Q. And how did he communicate with Mr. Herrera?</p> <p>11 A. By phone, by e-mail.</p> <p>12 Q. Would he communicate with Mr. Herrera</p> <p>13 frequently?</p> <p>14 A. No.</p> <p>15 Q. About how often would he communicate with</p> <p>16 Mr. Herrera?</p> <p>17 A. I don't know. Maybe once or twice every two</p> <p>18 or three months, but I don't remember</p> <p>19 exactly.</p> <p>20 Q. Do you recall him communicating with</p> <p>21 Mr. Herrera in 2000?</p> <p>22 A. I don't remember.</p> <p>23 Q. In 2001?</p> <p>24 A. No. Neither. I don't remember.</p>	<p style="text-align: right;">Page 48</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. And Jean De Roche is Mr. Murphy's secretary</p> <p>3 now?</p> <p>4 A. Yes, I believe so.</p> <p>5 Q. Now?</p> <p>6 A. I think so, yes, until yesterday.</p> <p>7 Q. Do you know if she was also the secretary in</p> <p>8 2000 for Mr. Murphy?</p> <p>9 A. No. She was not his secretary.</p> <p>10 Q. Who was his secretary in 2000?</p> <p>11 A. I don't remember who he or she was. I</p> <p>12 suppose that he did have a secretary, but I</p> <p>13 don't remember who he was.</p> <p>14 Q. Why do you know that it was not Jean</p> <p>15 De Roche?</p> <p>16 A. Because she has been on the job not too long</p> <p>17 ago. She introduce herself to me via an</p> <p>18 e-mail.</p> <p>19 Q. When did she do that?</p> <p>20 A. It could be like a year ago, two years ago.</p> <p>21 I don't remember exactly, more or less.</p> <p>22 Q. Does Jean De Roche work in Spain?</p> <p>23 A. No.</p> <p>24 Q. Where does Jean De Roche work?</p>
<p style="text-align: right;">Page 47</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. Do you know when you think Mr. Horvath left</p> <p>3 Bentley Pharmaceuticals?</p> <p>4 A. I don't know the date when he left the</p> <p>5 company.</p> <p>6 Q. Do you know Jim Murphy?</p> <p>7 A. Yes.</p> <p>8 Q. How do you know Jim Murphy?</p> <p>9 A. Well, the same, you know, he will come to the</p> <p>10 company, and they will introduce me to him.</p> <p>11 Q. When do you think the first time was that you</p> <p>12 met Jim Murphy?</p> <p>13 A. I think it was in 1999.</p> <p>14 Q. Does Mr. Murphy have a secretary?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know who his secretary is?</p> <p>17 A. Yes.</p> <p>18 Q. Who is his secretary?</p> <p>19 A. Jean De Roche.</p> <p>20 Q. Could you spell that? Could you spell that</p> <p>21 in Spanish, please.</p> <p>22 A. It's spelled J-E-A-N; last name D-E</p> <p>23 R-O-C-H-E. I'm not sure if this is the</p> <p>24 correct spelling.</p>	<p style="text-align: right;">Page 49</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. Bentley Pharmaceuticals.</p> <p>3 Q. Does Mr. Murphy have a secretary in Spain?</p> <p>4 A. No.</p> <p>5 Q. And how many secretaries has Mr. Murphy had</p> <p>6 at Bentley Pharmaceuticals, if you know,</p> <p>7 between 1999 and the present?</p> <p>8 MS. ABREU: Objection. Phase one</p> <p>9 time frame.</p> <p>10 A. In terms of secretary, this is the only one</p> <p>11 that I know of. The others I don't know. I</p> <p>12 don't know if the others were secretaries or</p> <p>13 what.</p> <p>14 Q. Who were the others?</p> <p>15 A. It was the people that answered the phone,</p> <p>16 but I don't know if they were the secretaries</p> <p>17 for Jim Murphy. I just don't know.</p> <p>18 Q. Were they male or female?</p> <p>19 A. They were female.</p> <p>20 Q. Do you know their names?</p> <p>21 A. I don't remember. I think Colleen was one of</p> <p>22 them; but again, I don't think it was his</p> <p>23 secretary. I mean, I just don't know.</p> <p>24 Q. Was it a long time ago?</p>

13 (Pages 46 to 49)

<p style="text-align: right;">Page 50</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. You're talking about the old secretaries, the</p> <p>3 older days?</p> <p>4 Q. Yes.</p> <p>5 A. But I don't know exactly if he had had</p> <p>6 secretaries and whom were they. I just don't</p> <p>7 know.</p> <p>8 Q. Do you know if he had any other assistants?</p> <p>9 A. No. I don't know.</p> <p>10 Q. As you understand it, what company does</p> <p>11 Mr. Murphy work for?</p> <p>12 MS. ABREU: Objection. Time frame.</p> <p>13 A. He works for Bentley Pharmaceuticals.</p> <p>14 THE INTERPRETER: She asked if it</p> <p>15 was okay to answer the question.</p> <p>16 MS. ABREU: Yes.</p> <p>17 Q. Yes, absolutely. Unless your attorney or I</p> <p>18 ask you not to, please, answer all the</p> <p>19 questions. So you understand that Mr. Murphy</p> <p>20 works for Bentley Pharmaceuticals?</p> <p>21 A. Yes.</p> <p>22 Q. Bentley in the United States?</p> <p>23 A. Yes.</p> <p>24 Q. Do you know what Mr. Murphy's position at</p>	<p style="text-align: right;">Page 52</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 MS. ABREU: Objection. Time frame.</p> <p>3 A. Yes.</p> <p>4 Q. Do people in Laboratorios Belmac refer to</p> <p>5 Mr. Murphy as someone who works for Bentley?</p> <p>6 MS. ABREU: Objection. Ambiguous.</p> <p>7 People.</p> <p>8 A. Yes, Bentley. Yes.</p> <p>9 Q. People like Mr. Herrera?</p> <p>10 A. Mr. Herrera doesn't know he works for</p> <p>11 Bentley.</p> <p>12 Q. Is this the basis of your understanding that</p> <p>13 Mr. Murphy works for Bentley Pharmaceuticals?</p> <p>14 A. Yes, I understand it that way that he works</p> <p>15 for Bentley Pharmaceuticals, Jim Murphy.</p> <p>16 Q. How often does Mr. Murphy travel to Spain?</p> <p>17 A. Like twice a year, more or less.</p> <p>18 Q. I'm going to show you a couple of documents,</p> <p>19 and we'll discuss a little bit about those</p> <p>20 documents, and I will give a copy to your</p> <p>21 attorneys; and sometimes if the documents are</p> <p>22 in English, the translator will translate</p> <p>23 them for you.</p> <p>24 Let me clarify, the translator will</p>
<p style="text-align: right;">Page 51</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Bentley Pharmaceuticals is?</p> <p>3 A. He's the president.</p> <p>4 Q. Do you know if Mr. Murphy works for any other</p> <p>5 company?</p> <p>6 A. I don't know.</p> <p>7 Q. Have you ever seen any letters from</p> <p>8 Mr. Murphy or faxes from Mr. Murphy on</p> <p>9 Bentley Pharmaceuticals' letterhead?</p> <p>10 A. Yes.</p> <p>11 Q. E-mails?</p> <p>12 A. Yes.</p> <p>13 Q. About how many faxes have you seen from</p> <p>14 Mr. Murphy on Bentley Pharmaceuticals'</p> <p>15 letterhead?</p> <p>16 MS. ABREU: Objection. Time frame.</p> <p>17 Q. Between 1999 and the present?</p> <p>18 MS. ABREU: Objection. Phase one</p> <p>19 time frame.</p> <p>20 A. I don't know. I cannot remember. It could</p> <p>21 be anything, 20, 30. Before it used to be</p> <p>22 faxes, but I just don't remember.</p> <p>23 Q. Do you receive telephone calls from</p> <p>24 Mr. Murphy from Bentley Pharmaceuticals?</p>	<p style="text-align: right;">Page 53</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 translate the portions that we're discussing</p> <p>3 as I discuss them for you; and if you have</p> <p>4 any questions about a translation, please</p> <p>5 feel free to ask, and we'll try to clarify</p> <p>6 that for you. Is that all right?</p> <p>7 A. Yes, it's okay.</p> <p>8 (Exhibit No. 1, Calendar, so marked)</p> <p>9 Q. I would like you to look at the first set of</p> <p>10 documents which are marked as Exhibit 1. I</p> <p>11 will represent to you that these consist of</p> <p>12 selections from a calendar of Mr. Murphy's</p> <p>13 from the year 2001. Would you, please, look</p> <p>14 through the document. I'm sorry. There's</p> <p>15 also a portion from 2002.</p> <p>16 It seems to be the calendar of Jim</p> <p>17 Murphy. Do you recognize the handwriting?</p> <p>18 A. No.</p> <p>19 Q. When Mr. Murphy travels to Spain, do you make</p> <p>20 his travel arrangements?</p> <p>21 A. No.</p> <p>22 Q. Do you know who does?</p> <p>23 A. In terms of flights, they do them from here,</p> <p>24 from the United States, the airline flights.</p>

14 (Pages 50 to 53)



<p style="text-align: right;">Page 54</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. Now, is that Jean De Roche?</p> <p>3 MS. ABREU: Objection. Phase one</p> <p>4 time frame.</p> <p>5 A. Currently, yes.</p> <p>6 Q. Do you receive itineraries for Mr. Murphy's</p> <p>7 travel if he is coming from Spain?</p> <p>8 A. Yes, usually they send them.</p> <p>9 Q. Did they send them in 2000?</p> <p>10 A. I don't remember. Most likely they did, but</p> <p>11 I don't remember.</p> <p>12 Q. Did you file any for 2000?</p> <p>13 A. If they had sent them if they were present,</p> <p>14 yes.</p> <p>15 Q. Did you file any for 2001?</p> <p>16 A. If they were sent, yes, I would have to file</p> <p>17 them.</p> <p>18 Q. Do you recall if they were sent?</p> <p>19 A. I don't remember. I don't know.</p> <p>20 Q. But you received them?</p> <p>21 MS. ABREU: Objection. Phase one</p> <p>22 time frame.</p> <p>23 A. If I don't receive them, I request them.</p> <p>24 Yes, because usually somebody goes and picks</p>	<p style="text-align: right;">Page 56</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. For example, every year when they have the</p> <p>3 shareholders meeting in Spain, I do them.</p> <p>4 Q. And which hotels have you put Mr. Murphy at</p> <p>5 during those shareholder meetings?</p> <p>6 MS. ABREU: Objection. Time frame.</p> <p>7 A. Sometimes at Cadena Melia and other times at</p> <p>8 The Holiday.</p> <p>9 Q. Do you know how you paid for those visits?</p> <p>10 A. Sometimes they are paid from Spain. Other</p> <p>11 times they paid themselves.</p> <p>12 Q. I'd like you to turn to the two pages marked</p> <p>13 at the bottom BENTL 024867.</p> <p>14 A. Yes.</p> <p>15 Q. And 79 -- I'm sorry. 78.</p> <p>16 A. Yes.</p> <p>17 Q. If you look on the 29th, there's an entry</p> <p>18 that says move to new Spanish office; is that</p> <p>19 correct?</p> <p>20 MS. ABREU: Objection. Calls for</p> <p>21 speculation.</p> <p>22 A. Yes, I don't remember the date, but yes, we</p> <p>23 did move to a new office.</p> <p>24 Q. Where was the office that you moved from?</p>
<p style="text-align: right;">Page 55</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 him up or I will make arrangements for a car</p> <p>3 to pick him up.</p> <p>4 MR. FINE: Counsel, I don't believe</p> <p>5 we've seen any itineraries for Mr. Murphy's</p> <p>6 trip to Spain. I will request it now.</p> <p>7 MS. ABREU: We're looking for them.</p> <p>8 MR. BOSTWICK: Just to clarify, they</p> <p>9 were not requested now. Those were requested</p> <p>10 for half a year.</p> <p>11 Q. Do you know how Mr. Murphy's travel was paid</p> <p>12 for when he visited Spain?</p> <p>13 A. I don't know.</p> <p>14 Q. Did he stay in a hotel in Spain?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know if he paid for his hotels with a</p> <p>17 credit card?</p> <p>18 A. I don't know how it was paid.</p> <p>19 Q. Did you arrange for his hotels in Spain?</p> <p>20 A. What date?</p> <p>21 Q. Were there dates when you did?</p> <p>22 A. Some dates, yes. Others, no.</p> <p>23 Q. When did you arrange for Mr. Murphy's hotels?</p> <p>24 MS. ABREU: Objection. Time frame.</p>	<p style="text-align: right;">Page 57</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. Where I was talking about Madrid -- this is</p> <p>3 how it is in Madrid. We were street</p> <p>4 Montearragon, and then we moved to Teidi San</p> <p>5 Sebastin De Los Reyes.</p> <p>6 Q. That was just the Madrid operation; am I</p> <p>7 correct?</p> <p>8 MS. ABREU: Objection. Ambiguous.</p> <p>9 Which company?</p> <p>10 Q. Of Laboratorios Belmac?</p> <p>11 A. Yes.</p> <p>12 (Exhibit No. 2, Document, so marked)</p> <p>13 Q. I'd like you -- I'm going to give you another</p> <p>14 exhibit, and I'd like to talk a little bit</p> <p>15 more about the move. I'm going to mark that</p> <p>16 as Exhibit 2. Do you recognize this?</p> <p>17 A. Yes.</p> <p>18 Q. What is this?</p> <p>19 A. It's the organization structure of the</p> <p>20 company of the year 2001.</p> <p>21 Q. And which -- I'm assuming this is -- let's go</p> <p>22 through it a little bit before I ask you</p> <p>23 about the move. Have you ever seen this</p> <p>24 document before?</p>

15 (Pages 54 to 57)

<p style="text-align: right;">Page 58</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. Yes.</p> <p>3 Q. When did you see it?</p> <p>4 A. When did I see it? In December, most likely</p> <p>5 on the 30th of 2001.</p> <p>6 Q. And that was actually going to be my next</p> <p>7 question which is whether you prepared this</p> <p>8 document?</p> <p>9 A. I didn't prepare it. I copied it from a</p> <p>10 document that they gave me.</p> <p>11 Q. Who gave it to you?</p> <p>12 A. Mr. Herrera.</p> <p>13 Q. Did Mr. Herrera prepare a draft of this</p> <p>14 document?</p> <p>15 A. Most likely it was him or the human resources</p> <p>16 department.</p> <p>17 Q. Mr. Herrera is on this document, yes?</p> <p>18 A. Yes.</p> <p>19 Q. And he's at the top, yes?</p> <p>20 A. Yes.</p> <p>21 Q. As general manager; is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. Can you tell me a bit about what you</p> <p>24 understand the responsibilities of the</p>	<p style="text-align: right;">Page 60</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. And do you know if Mr. Gonzalez holds that</p> <p>3 position now?</p> <p>4 MS. ABREU: Objection. Asked and</p> <p>5 answered.</p> <p>6 A. No.</p> <p>7 Q. He does not?</p> <p>8 A. No.</p> <p>9 Q. Does he hold any position at Laboratorios</p> <p>10 Belmac?</p> <p>11 MS. ABREU: Objection. Asked and</p> <p>12 answered.</p> <p>13 A. He's no longer with us.</p> <p>14 Q. Do you know when he left Laboratorios Belmac?</p> <p>15 A. I think it has been two, three years. I</p> <p>16 don't remember exactly.</p> <p>17 Q. And below Mr. Gonzalez is something called GM</p> <p>18 assistant?</p> <p>19 A. Yes.</p> <p>20 Q. Is that you?</p> <p>21 A. Yes, this is the same thing as secretary.</p> <p>22 Q. And we've talked about your responsibilities?</p> <p>23 A. Yes.</p> <p>24 Q. And Mr. Clemente Gonzalez was in Laboratorios</p>
<p style="text-align: right;">Page 59</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 general manager to be?</p> <p>3 A. I understand its responsibilities are all the</p> <p>4 ones of the company.</p> <p>5 Q. I don't understand. Does Mr. Herrera answer</p> <p>6 the phones?</p> <p>7 A. No. When I mean he's responsible for the</p> <p>8 issues that happen of the company, what I</p> <p>9 mean is at each department there's certain</p> <p>10 people delegated; and those people have to</p> <p>11 report to him, but whatever happens at the</p> <p>12 company as the top person, he is responsible.</p> <p>13 Q. And right below Mr. Herrera is Clemente</p> <p>14 Gonzalez; is that correct?</p> <p>15 A. Yes.</p> <p>16 Q. And what did Mr. Gonzalez do in 2001?</p> <p>17 A. He works at a department of strategies that</p> <p>18 was created, but I don't know what it was</p> <p>19 about or what did he do.</p> <p>20 Q. I understood that you said that he worked in</p> <p>21 a department of strategies; is that correct?</p> <p>22 A. It was a department that had something to do</p> <p>23 with marketing strategies. I don't know</p> <p>24 exactly, but it was about marketing.</p>	<p style="text-align: right;">Page 61</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Belmac's Madrid offices, correct?</p> <p>3 A. Yes.</p> <p>4 Q. And Mr. Herrera is as we've discussed in or</p> <p>5 was in Laboratorios Belmac Madrid's offices;</p> <p>6 is that correct?</p> <p>7 MS. ABREU: Objection. Misstates</p> <p>8 testimony.</p> <p>9 A. Yes, he was also.</p> <p>10 Q. I would like you to look at the left hand</p> <p>11 side of the document?</p> <p>12 A. Yes.</p> <p>13 Q. And there is an entry below you and below</p> <p>14 Mr. Gonzalez and Mr. Herrera, and that entry</p> <p>15 is Jose Estevez. The words above</p> <p>16 Mr. Estevez's name are financial MGR, period?</p> <p>17 A. Yes.</p> <p>18 Q. What is that position?</p> <p>19 A. Finance director.</p> <p>20 Q. What did Mr. Estevez do?</p> <p>21 A. The functions of a financial director of a</p> <p>22 company.</p> <p>23 Q. What do you understand those to be?</p> <p>24 A. I don't know. That's another department.</p>

16 (Pages 58 to 61)

<p style="text-align: right;">Page 62</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. Did you receive as secretary for Mr. Herrera</p> <p>3 or Mr. Gonzalez reports from Mr. Estevez?</p> <p>4 A. No, I don't remember having received</p> <p>5 anything.</p> <p>6 Q. Did Mr. Estevez give any documents to</p> <p>7 Mr. Herrera or Mr. Gonzalez --</p> <p>8 MS. ABREU: Objection. Time frame.</p> <p>9 Q. -- while you were secretary?</p> <p>10 MS. ABREU: Objection. Phase one</p> <p>11 time frame.</p> <p>12 A. All the accounting documents of every months,</p> <p>13 yes.</p> <p>14 Q. What are those documents?</p> <p>15 A. The monthly balance, the accounts, the status</p> <p>16 of the accounts.</p> <p>17 Q. Have you met Mr. Estevez?</p> <p>18 A. Yes.</p> <p>19 Q. And does Mr. Estevez work or did at this time</p> <p>20 Mr. Estevez work in Laboratorios Belmac's</p> <p>21 office in Madrid?</p> <p>22 A. Yes.</p> <p>23 Q. And I'd like you to look at the other side of</p> <p>24 the document on the right, and there is a</p>	<p style="text-align: right;">Page 64</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 break.</p> <p>3 THE VIDEOGRAPHER: The time is 11:14</p> <p>4 a.m. on June 30, 2006. This is the end of</p> <p>5 tape number one.</p> <p>6 (Recess)</p> <p>7 THE VIDEOGRAPHER: The time is 11:38</p> <p>8 a.m. on June 30, 2006. This is tape number</p> <p>9 two.</p> <p>10 Q. Good morning, Senor Sanchez. I believe</p> <p>11 before our break we were discussing the</p> <p>12 organizational chart from Laboratorios Belmac</p> <p>13 dated December 31, 2001, and we were</p> <p>14 discussing Antonio Cabodevilla, and you know</p> <p>15 Mr. Cabodevilla?</p> <p>16 A. Yes.</p> <p>17 Q. And if you look a little bit further along</p> <p>18 between the entry for Mr. Estevez and</p> <p>19 Mr. Cabodevilla, there is the name, I</p> <p>20 believe, Ignacio Merano. It says above his</p> <p>21 name sales and marketing, MGR, period; is</p> <p>22 that correct?</p> <p>23 A. Yes.</p> <p>24 Q. And do you know what Mr. Merano does?</p>
<p style="text-align: right;">Page 63</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 name there, Antonio Cabodevilla?</p> <p>3 A. Yes.</p> <p>4 Q. And above it it says manufacturing MGR,</p> <p>5 period?</p> <p>6 A. Yes.</p> <p>7 Q. Do you know what Mr. Cabodevilla did in 2001</p> <p>8 at Laboratorios Belmac?</p> <p>9 A. Director of manufacturing must have been.</p> <p>10 Yes, if it's listed, yes, he was director of</p> <p>11 manufacturing.</p> <p>12 Q. Did Mr. Cabodevilla give any documents to</p> <p>13 Mr. Herrera or Mr. Gonzalez while you were</p> <p>14 secretary for Mr. Herrera?</p> <p>15 MS. ABREU: Objection. Phase one</p> <p>16 time frame.</p> <p>17 A. I suppose because he has sent documents.</p> <p>18 Q. How frequently does he send documents?</p> <p>19 A. Currently it varies. Maybe every day, two or</p> <p>20 three times. They're in constant</p> <p>21 communication.</p> <p>22 Q. I understand from our videographer that we</p> <p>23 have four minutes left on our tape, so I</p> <p>24 think now would be a good time to take a</p>	<p style="text-align: right;">Page 65</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. He's the commercial director of Laboratorios</p> <p>3 Belmac.</p> <p>4 Q. If you look between Mr. Merano and</p> <p>5 Mr. Cabodevilla and you look down a little</p> <p>6 bit, there is something that says regulatory</p> <p>7 AFW. Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. And what is that?</p> <p>10 A. It's the department of registries.</p> <p>11 Q. Was there someone who was in that position in</p> <p>12 2001, if you recall?</p> <p>13 A. Yes, there was one person; but that person</p> <p>14 was part of Davur Laboratories.</p> <p>15 Q. Who was that person?</p> <p>16 A. Carmine Galistal.</p> <p>17 Q. And just to clarify, how many secretaries are</p> <p>18 there in Laboratorios Belmac in Madrid?</p> <p>19 MS. ABREU: Objection. Time frame.</p> <p>20 A. One.</p> <p>21 Q. And in 2002 and 2004?</p> <p>22 MS. ABREU: Objection. Phase one</p> <p>23 time frame.</p> <p>24 A. That I remember, one.</p>

17 (Pages 62 to 65)

<p style="text-align: right;">Page 66</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. That is you?</p> <p>3 A. Yes.</p> <p>4 Q. And you have been the only secretary in</p> <p>5 Laboratorios Belmac in Madrid since 2000; is</p> <p>6 that correct?</p> <p>7 A. Yes.</p> <p>8 Q. And during that time you have been the only</p> <p>9 secretary to the general manager of</p> <p>10 Laboratorios Belmac?</p> <p>11 A. Yes.</p> <p>12 Q. And as part of your job, you need to</p> <p>13 understand who holds which positions within</p> <p>14 the company; is that correct?</p> <p>15 A. No.</p> <p>16 Q. But you do seem to know who holds what</p> <p>17 positions within the company; is that</p> <p>18 correct?</p> <p>19 A. Yes.</p> <p>20 Q. And part of the reason you need to know this</p> <p>21 is to keep up with your job?</p> <p>22 A. Yes.</p> <p>23 Q. For filing, answering the phone for</p> <p>24 Mr. Herrera?</p>	<p style="text-align: right;">Page 68</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. Usually with the commercial director at the</p> <p>3 national level.</p> <p>4 Q. With anyone else?</p> <p>5 A. Financial director. I don't think anybody</p> <p>6 else.</p> <p>7 Q. With the manufacturing director?</p> <p>8 A. When they hold the -- which is usually once a</p> <p>9 month or once or twice a month. Antonio</p> <p>10 Cabodevilla attends.</p> <p>11 Q. And do you know if Mr. Herrera met with</p> <p>12 Mr. Cabodevilla in Zaragoza?</p> <p>13 MS. ABREU: Objection. Time frame.</p> <p>14 A. That they met. He always meets with him</p> <p>15 every time he goes to Zaragoza.</p> <p>16 Q. And Mr. Herrera has gone to Zaragoza once a</p> <p>17 week more or less since 2000; is that</p> <p>18 correct?</p> <p>19 MS. ABREU: Objection. Phase one</p> <p>20 time frame.</p> <p>21 A. Yes.</p> <p>22 Q. And do you know if Mr. Herrera has phone</p> <p>23 calls with Jim Murphy?</p> <p>24 MS. ABREU: Objection. Time frame.</p>
<p style="text-align: right;">Page 67</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. Yes, of course I have to know.</p> <p>3 Q. You need to know this if you have to do any</p> <p>4 faxing; is that correct?</p> <p>5 A. Yes.</p> <p>6 Q. Or directing e-mails; is that correct?</p> <p>7 A. Yes.</p> <p>8 Q. And you need to know this so you can answer</p> <p>9 questions from clients; is that correct?</p> <p>10 MS. ABREU: Objection. Leading to</p> <p>11 matters of substance.</p> <p>12 A. Usually they don't ask questions to me.</p> <p>13 Q. I'd like to go into a period -- actually, I</p> <p>14 would like to go back and discuss Adolfo</p> <p>15 Herrera a little bit. Do you recall whether</p> <p>16 Adolfo Herrera held or had regular weekly</p> <p>17 management meetings?</p> <p>18 MS. ABREU: Objection. Time frame.</p> <p>19 A. He had regular meetings?</p> <p>20 Q. Meetings, yes.</p> <p>21 MS. ABREU: Same objection.</p> <p>22 A. At the company, yes.</p> <p>23 Q. Who would those meetings be with from 2000 to</p> <p>24 2003?</p>	<p style="text-align: right;">Page 69</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. Yes.</p> <p>3 Q. How frequently?</p> <p>4 A. Yes, I don't know. It all depends on the</p> <p>5 time or the topic.</p> <p>6 Q. If you had to -- in a time when it was more</p> <p>7 frequent, how frequently would it be?</p> <p>8 MS. ABREU: Objection. Vague and</p> <p>9 ambiguous.</p> <p>10 A. In what years?</p> <p>11 Q. 2001.</p> <p>12 A. I don't remember.</p> <p>13 Q. 2002?</p> <p>14 A. I don't remember.</p> <p>15 Q. Did Mr. Herrera have a phone call once a week</p> <p>16 with Mr. Murphy --</p> <p>17 MS. ABREU: Objection. Time frame.</p> <p>18 Q. -- while you have been Mr. Herrera's</p> <p>19 secretary?</p> <p>20 MS. ABREU: Objection. Phase one</p> <p>21 time frame.</p> <p>22 A. Maybe they spoke maybe once a week, maybe</p> <p>23 every 15th day. I don't know. I just don't</p> <p>24 know how often they spoke.</p>

18 (Pages 66 to 69)



<p style="text-align: right;">Page 70</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. And do you know how often they might have</p> <p>3 spoken by cell phone?</p> <p>4 MS. ABREU: Objection. Calls for</p> <p>5 speculation. Time frame.</p> <p>6 A. Cell phone, I don't know.</p> <p>7 Q. Do you know if there was any regularly</p> <p>8 scheduled phone call between Mr. Herrera and</p> <p>9 Mr. Murphy while you were Mr. Herrera's</p> <p>10 secretary?</p> <p>11 MS. ABREU: Objection. Phase one</p> <p>12 time frame.</p> <p>13 A. That they had been planned, no.</p> <p>14 Q. But there were phone calls?</p> <p>15 MS. ABREU: Objection. Time frame.</p> <p>16 A. Yes, the normal.</p> <p>17 Q. I'd like to ask you a little bit about 2003.</p> <p>18 Do you recall learning of a visit to the</p> <p>19 plant in Zaragoza by Ethypharm with a judge?</p> <p>20 A. I remember having hear something.</p> <p>21 Q. How did you hear of something?</p> <p>22 A. Because I remember having seen a fax from</p> <p>23 Zaragoza mentioning something that there were</p> <p>24 people, there were people coming and been</p>	<p style="text-align: right;">Page 72</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Mr. Herrera's language abilities.</p> <p>3 A. Okay.</p> <p>4 Q. Does Mr. Herrera speak English?</p> <p>5 A. Not too good but he can speak.</p> <p>6 Q. Does Mr. Herrera read English?</p> <p>7 A. Yes.</p> <p>8 Q. How well do you think he reads English?</p> <p>9 A. Good.</p> <p>10 Q. Does Mr. Herrera write in English?</p> <p>11 A. Yes.</p> <p>12 Q. How well does Mr. Herrera write in English in</p> <p>13 your opinion?</p> <p>14 A. Good.</p> <p>15 Q. Would you say he speaks English better than</p> <p>16 you do?</p> <p>17 A. Yes.</p> <p>18 Q. And do you know if Mr. Herrera speaks French?</p> <p>19 A. No. He doesn't speak French, nothing.</p> <p>20 Q. Did he read French?</p> <p>21 A. I don't know, but I don't think so.</p> <p>22 Q. Does he write in French?</p> <p>23 A. No.</p> <p>24 Q. Are there any other languages that</p>
<p style="text-align: right;">Page 71</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 there from Ethypharm.</p> <p>3 Q. Did that fax mention a judge?</p> <p>4 A. I don't remember.</p> <p>5 Q. Do you remember when that fax, when you saw</p> <p>6 that fax?</p> <p>7 A. No.</p> <p>8 Q. Do you remember approximately when that visit</p> <p>9 was?</p> <p>10 A. Three, four years. I don't remember.</p> <p>11 Q. Do you remember Mr. Herrera seeing that fax?</p> <p>12 A. I don't remember, but I'm pretty sure he saw</p> <p>13 it.</p> <p>14 Q. Why are you sure that he saw it?</p> <p>15 A. Because it was directed to him.</p> <p>16 Q. From whom was it directed?</p> <p>17 A. I suppose it was from Antonio Cabodevilla to</p> <p>18 Adolfo Herrera.</p> <p>19 MR. FINE: Counsel, for the record,</p> <p>20 I don't think we've seen that fax. If you</p> <p>21 could look into that, that would be very</p> <p>22 good.</p> <p>23 A. Sure.</p> <p>24 Q. I'd also like to ask you a little bit about</p>	<p style="text-align: right;">Page 73</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Mr. Herrera speaks other than Spanish?</p> <p>3 A. No, not as far as I know.</p> <p>4 Q. To confirm, he does read and speak and write</p> <p>5 in Spanish?</p> <p>6 A. Correct and very well.</p> <p>7 Q. Do you know what Mr. Herrera's job was before</p> <p>8 he was employed by Laboratorios Belmac?</p> <p>9 A. I understand that he used to work at another</p> <p>10 laboratory.</p> <p>11 Q. Do you know what that laboratory was?</p> <p>12 A. I don't remember the name of the other</p> <p>13 laboratory.</p> <p>14 Q. Do you know what position he was, he held at</p> <p>15 that other laboratory, if you know?</p> <p>16 A. No, I don't know.</p> <p>17 Q. If Mr. Herrera -- strike that.</p> <p>18 I'd like to confirm your e-mail</p> <p>19 address at Laboratorios Belmac? What is it?</p> <p>20 A. Conchas@belmac.com.</p> <p>21 Q. Mr. Herrera's address at Laboratorios Belmac,</p> <p>22 do you know that?</p> <p>23 A. Herrera@belmac.com.</p> <p>24 Q. Does Mr. Herrera have any other e-mail</p>

19 (Pages 70 to 73)

<p style="text-align: right;">Page 74</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 addresses?</p> <p>3 A. No.</p> <p>4 Q. Do you know if Mr. Herrera has any personal</p> <p>5 e-mail addresses?</p> <p>6 A. I don't think so.</p> <p>7 Q. I'd like to go back for a second to the</p> <p>8 documents and files that we had discussed</p> <p>9 earlier, earlier this morning. We had</p> <p>10 mentioned the locations of documents from</p> <p>11 Bentley that you had filed?</p> <p>12 A. Yes.</p> <p>13 Q. And could you tell me where documents that</p> <p>14 you filed from Ethypharm were?</p> <p>15 A. Another cabinet, a different cabinet all</p> <p>16 together.</p> <p>17 Q. Where is that cabinet?</p> <p>18 A. It is at the room that is just by itself.</p> <p>19 It's not my dispatcho or Senor Herrera's</p> <p>20 dispatcho.</p> <p>21 Q. Were the documents from Ethypharm in a room</p> <p>22 by themselves in 2000?</p> <p>23 A. No. They were all together. Now they're</p> <p>24 separated because we don't have a space.</p>	<p style="text-align: right;">Page 76</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 A. Because I haven't destroyed them. I'm sure</p> <p>3 of that.</p> <p>4 Q. Do you know if anyone else has destroyed any</p> <p>5 documents from the files?</p> <p>6 MS. ABREU: Objection. Calls for</p> <p>7 speculation.</p> <p>8 A. I don't know what other people have done. I</p> <p>9 mean, I only know what I did.</p> <p>10 Q. Who else do you think has access to those</p> <p>11 files?</p> <p>12 A. I don't think no one else have access to this</p> <p>13 files. I mean, they're open files, but I</p> <p>14 don't think nobody else goes there.</p> <p>15 Q. Were you involved in helping to collect</p> <p>16 documents for this case?</p> <p>17 A. Yes.</p> <p>18 Q. Did you do that yourself?</p> <p>19 A. Myself and other, many other people.</p> <p>20 Q. Who were the other people?</p> <p>21 A. You know, people from the finance department,</p> <p>22 people from the regulatory department. I</p> <p>23 mean people from all over the company.</p> <p>24 Q. And did you collect documents from the files</p>
<p style="text-align: right;">Page 75</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. When were they separated?</p> <p>3 A. Within the same office, but next door we have</p> <p>4 created new dispatchos, and those are the</p> <p>5 places that these files have been moved to.</p> <p>6 Q. When were those created?</p> <p>7 A. It has been about approximately six months.</p> <p>8 Q. And since 2000 have you ever had occasion to</p> <p>9 remove any documents from either the files</p> <p>10 from Bentley or the files concerning</p> <p>11 Ethypharm?</p> <p>12 MS. ABREU: Objection. Ambiguous.</p> <p>13 Remove.</p> <p>14 A. Yes, when we moved to the new office.</p> <p>15 Q. Did anyone else remove documents from the</p> <p>16 files from Bentley or concerning Ethypharm</p> <p>17 since 2000?</p> <p>18 MS. ABREU: Objection. Calls for</p> <p>19 speculation.</p> <p>20 A. No, only myself.</p> <p>21 Q. Did you ever destroy any documents from the</p> <p>22 files from Bentley or relating to Ethypharm?</p> <p>23 A. No, never.</p> <p>24 Q. And how do you know?</p>	<p style="text-align: right;">Page 77</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 from Bentley for this case?</p> <p>3 A. I don't remember. Everything that we were</p> <p>4 requesting, we were pulling out, but I just</p> <p>5 don't remember where they came from.</p> <p>6 Q. Do you recall removing for this case any</p> <p>7 documents from the files relating to Bentley?</p> <p>8 A. From Bentley, I don't think so, but I don't</p> <p>9 remember either.</p> <p>10 Q. Do you recall anyone else, if you know,</p> <p>11 removing files from the files of Bentley in</p> <p>12 Laboratorios Belmac for this case?</p> <p>13 A. I don't know because many people of the</p> <p>14 company were working at this. They were</p> <p>15 looking for documents.</p> <p>16 MR. FINE: I think I'd like to take</p> <p>17 a break for a minute.</p> <p>18 MS. ABREU: The time is 12:04 p.m.</p> <p>19 We're off the record.</p> <p>20 (Recess)</p> <p>21 THE VIDEOGRAPHER: The time is 12:12</p> <p>22 p.m. We're back on the record.</p> <p>23 Q. Good afternoon, Senor Sanchez. I would like</p> <p>24 to clarify something a little bit. Earlier</p>

20 (Pages 74 to 77)

<p style="text-align: right;">Page 78</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 today you had talked about documents that you</p> <p>3 filed for Adolfo Herrera from Bentley?</p> <p>4 A. Yes.</p> <p>5 Q. And that those files were kept in</p> <p>6 Mr. Herrera's office?</p> <p>7 A. Between Senor Herrera and my dispatcho.</p> <p>8 Q. And that was approximately one and a half</p> <p>9 meters or five filing cabinets of documents?</p> <p>10 A. Yes.</p> <p>11 Q. And were those documents reviewed for</p> <p>12 production in this case?</p> <p>13 A. I'm assuming that, yes, they were looked at,</p> <p>14 but I just don't remember.</p> <p>15 Q. Do you know?</p> <p>16 A. No, I don't. They probably were looked at,</p> <p>17 but I don't know in details because we look</p> <p>18 at all cabinets and files.</p> <p>19 Q. And you earlier talked about documents from</p> <p>20 Ethypharm that you filed for Mr. Herrera?</p> <p>21 A. Yes.</p> <p>22 Q. And Mr. Gonzalez?</p> <p>23 A. Some, yes.</p> <p>24 Q. That was about one to three meters of</p>	<p style="text-align: right;">Page 80</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Q. Do you recall that you mentioned you met him</p> <p>3 and that you knew him?</p> <p>4 A. Yes.</p> <p>5 Q. To your knowledge, does Jim Murphy have a</p> <p>6 position at Laboratorios Belmac in Spain?</p> <p>7 A. Yes.</p> <p>8 Q. And what is that position?</p> <p>9 A. He is president of cousejero delegado of</p> <p>10 Laboratorios Belmac.</p> <p>11 Q. To your knowledge, from the years 2000</p> <p>12 through the years 2003, was Mr. Murphy</p> <p>13 president of consejero delegado of</p> <p>14 Laboratorios Belmac?</p> <p>15 A. I think so, but I don't know exactly starting</p> <p>16 at which date.</p> <p>17 Q. That's fine. Do you recall earlier today</p> <p>18 when you testified about Adolfo Herrera's</p> <p>19 responsibilities as general manager of</p> <p>20 Laboratorios Belmac?</p> <p>21 A. Yes.</p> <p>22 Q. Among Adolfo Herrera's responsibilities at</p> <p>23 Laboratorios Belmac, is he responsible for</p> <p>24 managing the day-to-day activities of</p>
<p style="text-align: right;">Page 79</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 documents, I think? I don't recall entirely.</p> <p>3 A. From Ethypharm, yes, more or less. I don't</p> <p>4 remember either.</p> <p>5 Q. Do you know whether those documents were</p> <p>6 reviewed for production in this case?</p> <p>7 A. From Ethypharm, yes, for sure.</p> <p>8 Q. How do you know that?</p> <p>9 A. Because those were specifics where my</p> <p>10 dispatcho and we were constantly pulling</p> <p>11 things out.</p> <p>12 MR. FINE: Thank you. I have no</p> <p>13 further questions.</p> <p>14 EXAMINATION BY MS. ABREU</p> <p>15 Q. Concha Sanchez, I'm Veronica Abreu, and I</p> <p>16 represent Bentley Pharmaceuticals, and I only</p> <p>17 have a couple of questions for you this</p> <p>18 morning; but before we begin, I would like to</p> <p>19 extend our deep appreciation for you for</p> <p>20 coming all the way to the United States for</p> <p>21 being deposed in this case.</p> <p>22 Concha, do you recall earlier today</p> <p>23 when we were speaking about Jim Murphy?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 81</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 Laboratorios Belmac?</p> <p>3 A. He has people that he has delegated to do</p> <p>4 whatever needs to be done.</p> <p>5 Q. Do these people report to him?</p> <p>6 A. Yes.</p> <p>7 Q. So is he -- from the years -- since you've</p> <p>8 been at Belmac through 2003, was</p> <p>9 Dr. Herrera's ultimately responsible for</p> <p>10 managing the people to whom he delegated</p> <p>11 day-to-day activities --</p> <p>12 MR. FINE: Objection. Speculation.</p> <p>13 Q. -- for Laboratorios Belmac?</p> <p>14 A. Yes, he was responsible.</p> <p>15 Q. And then I have just one more question. Do</p> <p>16 you recall earlier today when you were</p> <p>17 discussing your involvement in collecting</p> <p>18 documents for this litigation?</p> <p>19 A. Yes.</p> <p>20 Q. Were you the only person at Laboratorios</p> <p>21 Belmac who collected documents for this</p> <p>22 litigation?</p> <p>23 A. No, there were other people.</p> <p>24 MS. ABREU: Thank you. No further</p>

21 (Pages 78 to 81)

<p style="text-align: right;">Page 82</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 questions.</p> <p>3 MR. FINE: I have one follow-up</p> <p>4 question to ask based on the questions that</p> <p>5 counsel has just asked.</p> <p>6 EXAMINATION BY MR. FINE</p> <p>7 Q. That is you just indicated that Mr. Murphy is</p> <p>8 the president of Belmac Laboratories?</p> <p>9 A. President and cosejero delegado.</p> <p>10 Q. Did you discuss that question or your answer</p> <p>11 to that question during a break?</p> <p>12 A. No. We just have been here, myself and her.</p> <p>13 I haven't even moved from here.</p> <p>14 MR. FINE: Thank you. Counsel,</p> <p>15 based on the conversations with Ms. Sanchez,</p> <p>16 I would like to ask you to confirm the files</p> <p>17 within Laboratorios Belmac have been searched</p> <p>18 and documents relevant to this case have been</p> <p>19 produced?</p> <p>20 MS. ABREU: They have.</p> <p>21 MR. FINE: Thank you very much.</p> <p>22 THE VIDEOGRAPHER: The time is 12:21</p> <p>23 p.m. on June 30, 2006. This is the end of</p> <p>24 tape number two, and this completes the</p>	<p style="text-align: right;">Page 84</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 CERTIFICATE</p> <p>3</p> <p>4 COMMONWEALTH OF MASSACHUSETTS</p> <p>5</p> <p>6 I, Tina M. Sarcia, a Registered</p> <p>7 Professional Reporter and Notary Public in</p> <p>8 and for the Commonwealth of Massachusetts, do</p> <p>9 hereby certify that the foregoing transcript</p> <p>10 of the deposition of CONCHA SANCHEZ, having</p> <p>11 been duly sworn, on Friday, June 30, 2006, is</p> <p>12 true and accurate to the best of my</p> <p>13 knowledge, skill and ability.</p> <p>14 IN WITNESS WHEREOF, I have hereunto</p> <p>15 set my hand and seal this 13th day of</p> <p>16 June, 2006.</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Tina M. Sarcia, RPR</p> <p>21 Notary Public</p> <p>22</p> <p>23 My commission expires: March 13, 2009</p> <p>24</p>
<p style="text-align: right;">Page 83</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 videotape deposition of Concha Sanchez.</p> <p>3 (Whereupon the deposition was</p> <p>4 concluded at 12:21 p.m.)</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: right;">Page 85</p> <p>1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY</p> <p>2 DEPONENT'S ERRATA SHEET</p> <p>3 AND SIGNATURE INSTRUCTIONS</p> <p>4</p> <p>5 The original of the Errata Sheet has</p> <p>6 been delivered to Veronia Abreu, Esq.</p> <p>7 When the Errata Sheet has been</p> <p>8 completed by the deponent and signed, a copy</p> <p>9 thereof should be delivered to each party of</p> <p>10 record and the ORIGINAL delivered to Jonathan</p> <p>11 Fine, Esq. to whom the original deposition</p> <p>12 transcript was delivered. ....</p> <p>13</p> <p>14 INSTRUCTIONS TO DEPONENT</p> <p>15</p> <p>16 After reading this volume of your</p> <p>17 deposition, indicate any corrections or</p> <p>18 changes to your testimony and the reasons</p> <p>19 therefor on the Errata Sheet supplied to you</p> <p>20 and sign it. DO NOT make marks or notations</p> <p>21 on the transcript volume itself.</p> <p>22</p> <p>23 REPLACE THIS PAGE OF THE TRANSCRIPT WITH THE</p> <p>24 COMPLETED AND SIGNED ERRATA SHEET WHEN</p> <p>RECEIVED.</p>

22 (Pages 82 to 85)



1 CONFIDENTIAL - FOR ATTORNEYS' EYES ONLY  
2 ATTACH TO THE DEPOSITION OF CONCHA SANCHEZ.  
CASE: ETHYPHARM V BENTLEY PHARMACEUTICALS

INSTRUCTIONS: After reading the transcript  
5 of your deposition, note any change or  
correction to your testimony and the reason  
6 therefor on this sheet. DO NOT make any  
marks or notations on the transcript volume  
7 itself. Sign and date this errata sheet  
(before a Notary Public, if required). Refer  
8 to Page 85 of the transcript for errata sheet  
distribution instructions.

10 CHANGE:  
11 REASON: CHANGE:  
12 REASON: CHANGE:  
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19 REASON: CHANGE:  
REASON:

I have read the foregoing transcript  
of my deposition and except for any  
corrections or changes noted above, I hereby  
subscribe to the transcript as an accurate  
record of the statements made by me.

CONCHA SANCHEZ      DATE

**JT-A-1223**

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